

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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CITY OF LIVONIA EMPLOYEES'	:	Civil Action No. 1:07-cv-10329-RJS
RETIREMENT SYSTEM, On Behalf of Itself	:	
and All Others Similarly Situated,	:	<u>CLASS ACTION</u>
	:	
Plaintiff,	:	MOTION TO ADMIT COUNSEL <i>PRO HAC</i>
	:	<i>VICE</i>
vs.	:	
	:	
WYETH, et al.,	:	
	:	
Defendants.	:	
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FILED  
U.S. DISTRICT COURT  
2008 FEB -8 PM 1:20  
S.D. OF N.Y.

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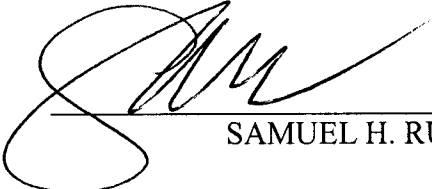
PURSUANT TO RULE 1.3(c) of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York, I, Samuel H. Rudman, a member in good standing of the bar of this Court, hereby move for an Order allowing the admission, *pro hac vice*, of:

Trig Randall Smith  
COUGHLIN STOIA GELLER RUDMAN  
& ROBBINS LLP  
655 West Broadway, Suite 1900  
San Diego, CA 92101  
Telephone: 619/231-1058  
619/231-7423 (fax)

Trig Randall Smith is a member in good standing of the Bars of the States of Colorado and California (Certificates of Good Standing attached hereto as Exhibit A), as well as the United States District Court of the Southern District of California. There are no pending disciplinary proceedings against Trig Randall Smith in any State or Federal court.

DATED: February 7, 2008

COUGHLIN STOIA GELLER  
RUDMAN & ROBBINS LLP  
SAMUEL H. RUDMAN  
DAVID A. ROSENFELD



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SAMUEL H. RUDMAN

58 South Service Road, Suite 200  
Melville, NY 11747  
Telephone: 631/367-7100  
631/367-1173 (fax)

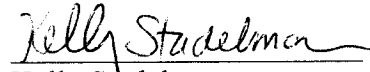
COUGHLIN STOIA GELLER  
RUDMAN & ROBBINS LLP  
RAMZI ABADOU  
655 West Broadway, Suite 1900  
San Diego, CA 92101  
Telephone: 619/231-1058  
619/231-7423 (fax)

[Proposed] Lead Counsel for Plaintiff

**CERTIFICATE OF SERVICE**

I, Kelly Stadelmann, hereby certify that on February 8, 2008, I caused a true and correct copy of the attached:

Motion For Admission *Pro Hac Vice*, and Supporting Papers  
to be served by United States mail to all counsel listed on the attached service list.

  
Kelly Stadelmann

WYETH

Service List - 2/1/2008 (07-0254)

Page 1 of 1

**Counsel For Defendant(s)**

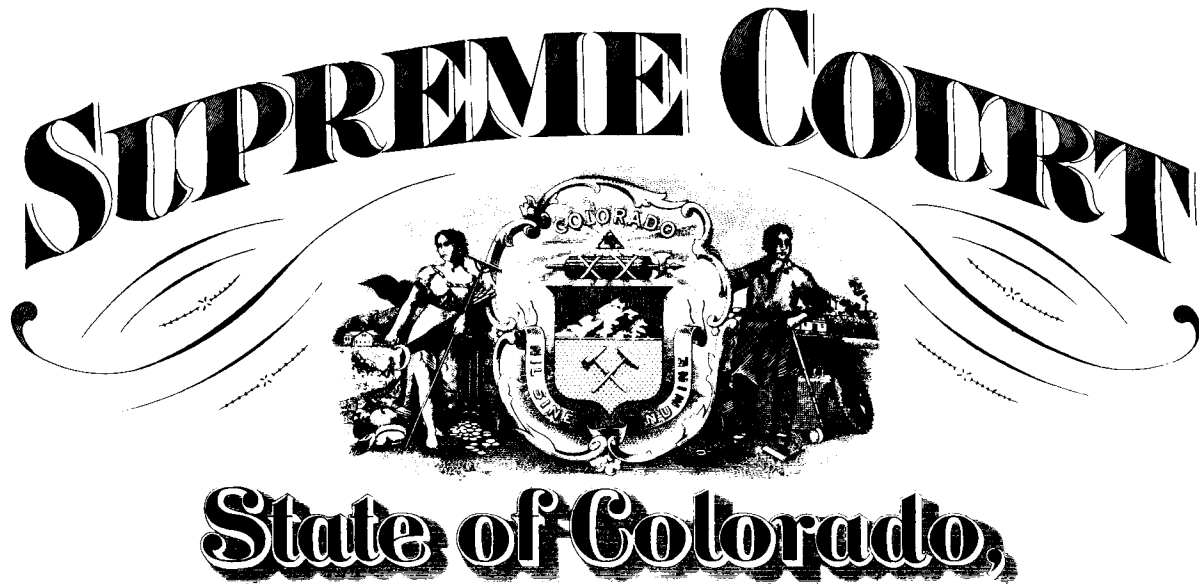
Michael J. Chepiga  
Lynn K. Neuner  
Simpson Thacher & Bartlett LLP  
425 Lexington Avenue  
New York, NY 10017-3954  
212/455-2000  
212/455-2502(Fax)

**Counsel For Plaintiff(s)**

Samuel H. Rudman  
David A. Rosenfeld  
Coughlin Stoia Geller Rudman & Robbins LLP  
58 South Service Road, Suite 200  
Melville, NY 11747  
631/367-7100  
631/367-1173(Fax)

Ramzi Abadou  
Coughlin Stoia Geller Rudman & Robbins LLP  
655 West Broadway, Suite 1900  
San Diego, CA 92101  
619/231-1058  
619/231-7423(Fax)

## EXHIBIT A



STATE OF COLORADO, ss:

I, Susan J. Festag Clerk of the Supreme Court of the State of Colorado, do hereby certify that

TRIG R SMITH

has been duly licensed and admitted to practice as an

ATTORNEY AND COUNSELOR AT LAW

within this State; and that his/her name appears upon the Roll of Attorneys and Counselors at Law in my office of date the 15<sup>th</sup>

day of May A. D. 2001 and that at the date hereof the said TRIG R SMITH

is in good standing at this Bar.

IN WITNESS WHEREOF, I have hereunto subscribed my name and affixed the Seal of said Supreme Court, at Denver, in said State, this

1<sup>st</sup> day of February A. D. 2008

Susan J. Festag

Clerk





# THE STATE BAR OF CALIFORNIA

MEMBER SERVICES CENTER

180 HOWARD STREET, SAN FRANCISCO, CALIFORNIA 94105-1639

TELEPHONE: 888-800-3400

January 31, 2008

## TO WHOM IT MAY CONCERN:

This is to certify that according to the records of the State Bar, TRIG RANDALL SMITH, #237399 was admitted to the practice of law in this state by the Supreme Court of California on June 20, 2005; and has been since that date, and is at date hereof, an ACTIVE member of the State Bar of California; and that no recommendation for discipline for professional or other misconduct has ever been made by the Board of Governors or a Disciplinary Board to the Supreme Court of the State of California.

THE STATE BAR OF CALIFORNIA

Kath Lambert  
Custodian of Membership Records

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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CITY OF LIVONIA EMPLOYEES'	:	Civil Action No. 1:07-cv-10329-RJS
RETIREMENT SYSTEM, On Behalf of Itself	:	
and All Others Similarly Situated,	:	<u>CLASS ACTION</u>
	:	
Plaintiff,	:	AFFIDAVIT OF SAMUEL H. RUDMAN IN
	:	SUPPORT OF MOTION TO ADMIT
vs.	:	COUNSEL <i>PRO HAC VICE</i>
	:	
WYETH, et al.,	:	
	:	
Defendants.	:	
	:	
	X	



SAMUEL H. RUDMAN, being duly sworn, deposes and says as follows:

1. I am a member of Coughlin Stoia Geller Rudman & Robbins LLP, Lead Counsel for plaintiff in the above-captioned action. I am familiar with the proceedings in this case. I make this statement based on my personal knowledge of the facts set forth herein and in support of plaintiff's motion to admit Trig Randall Smith as counsel, *pro hac vice*, to represent plaintiff in this matter.

2. I am a member in good standing of the bar of the State of New York, and was admitted to practice law in May 1993. I am also admitted to the bar of the United States District Court for the Southern District of New York, and am in good standing with this Court.

3. Mr. Smith is a member of Coughlin Stoia Geller Rudman & Robbins LLP, in San Diego, California.

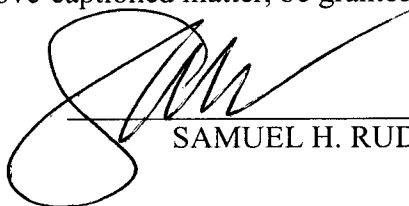
4. I have found Mr. Smith to be a skilled attorney and a person of integrity. He is experienced in Federal practice and is familiar with the Federal Rules of Procedure.

5. Accordingly, I am placed to move for the admission of Trig Randall Smith, *pro hac vice*.

6. I respectfully submit a proposed order granting the admission of Trig Randall Smith, *pro hac vice*, which is attached hereto as Exhibit A.

WHEREFORE it is respectfully requested that the motion to admit Trig Randall Smith, *pro hac vice*, to represent plaintiff in the above-captioned matter, be granted.

DATED: February 7, 2008

  
\_\_\_\_\_  
SAMUEL H. RUDMAN (SR-7957)

**CERTIFICATE OF SERVICE**

I, Kelly Stadelmann, hereby certify that on February 8, 2008, I caused a true and correct copy of the attached:

Motion For Admission *Pro Hac Vice*, and Supporting Papers  
to be served by United States mail to all counsel listed on the attached service list.

  
Kelly Stadelmann

WYETH

Service List - 2/1/2008 (07-0254)

Page 1 of 1

**Counsel For Defendant(s)**

Michael J. Chepiga

Lynn K. Neuner

Simpson Thacher & Bartlett LLP

425 Lexington Avenue

New York, NY 10017-3954

212/455-2000

212/455-2502(Fax)

**Counsel For Plaintiff(s)**

Samuel H. Rudman

David A. Rosenfeld

Coughlin Stoia Geller Rudman & Robbins LLP

58 South Service Road, Suite 200

Melville, NY 11747

631/367-7100

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619/231-1058

619/231-7423(Fax)

## EXHIBIT A

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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CITY OF LIVONIA EMPLOYEES'	:	Civil Action No. 1:07-cv-10329-RJS
RETIREMENT SYSTEM, On Behalf of Itself	:	
and All Others Similarly Situated,	:	<u>CLASS ACTION</u>
	:	
Plaintiff,	:	[PROPOSED] ORDER FOR ADMISSION
	:	<i>PRO HAC VICE</i> ON WRITTEN MOTION
vs.	:	
	:	
WYETH, et al.,	:	
	:	
Defendants.	:	
<hr/>		x

Upon the motion of Samuel H. Rudman, attorney for plaintiff Pipefitters Union Local 537 Pension Fund, and said sponsor attorney's affidavit in support;

IT IS HEREBY ORDERED that

Trig Randall Smith  
COUGHLIN STOIA GELLER RUDMAN  
& ROBBINS LLP  
655 West Broadway, Suite 1900  
San Diego, CA 92101  
Telephone: 619/231-1058  
619/231-7423 (fax)  
E-mail: Trigs@csgrr.com

is admitted to practice, *pro hac vice*, as counsel for plaintiff Pipefitters Union Local 537 Pension Fund in the above-captioned case in the United States District Court for the Southern District of New York. All attorneys appearing before this Court are subject to the Local Rules of this Court, including the Rules governing discipline of attorneys. If this action is assigned to the Electronic Case Filing (ECF) system, counsel shall immediately apply for an ECF password at [nysd.uscourts.gov](http://nysd.uscourts.gov). Counsel shall forward the *pro hac vice* fee to the Clerk of Court.

DATED: February \_\_, 2008

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THE HONORABLE RICHARD J. SULLIVAN  
UNITED STATES DISTRICT JUDGE